

COMMENTS AND RESPONSE

ON THE DRAFT PERMIT

November 18, 2008

A few minor comments were received by the Division on October 31, 2008 from the Catlettsburg Refining, LLC during the thirty-day response period. Responses were made to the comments and some minor changes were made to the permit. The Division has made a final determination to issue the proposed permit. The proposed permit will become final upon approval of the EPA in 45 days.

V-05-089 R2:

Comments on the significant revision draft Title V permit (V-05-089 R2) were received by the Division for Air Quality from Mr. William J. Ewing, Senior HES Professional at Catlettsburg Refining, LLC on October 31, 2008.

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Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions – Emission Points: Heaters, Boilers, and Combustion Devices. The table on pages 41-43 of 366 contains the following errors:

- H054 (1-06-TB-1, 2) Tank 118 Heater is a redundant source to H005 and H006. It should be removed from the permit as this was a listing error in the application.
- H057 (1-16-TB-36) Asphalt Tank Heater has been removed. The other portion of H057 (1-15-TB-TB-35) is still present. *(Note: Bill Ewing communicated by e-mail to Ralph Gosney on 11-18-08 that this should read H057 (1-6-TB-35) and H057 (1-6-TB-36)).*

Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions – Emission Points: Heaters, Boilers, and Combustion Devices. The table on pages 45-51 of 366 contains the following errors:

- Source H024 (Asphalt Mix Heater) is shown as having NO_x and O₂ continuous analyzers. These analyzers are actually present on source H023 (Sat Gas Fractionator Reboiler) but are not shown as having them. Please shift the contents of the H024 (Asphalt Mix Heater) cell up to H023 (Sat Gas Fractionator Reboiler).
- Sources B024, B025, and B026 (Boilers #13, 14 and 15) are shown as having SO₂ continuous analyzers. These boilers are fired from natural gas and as such are assumed to be in compliance with SO₂ standards thus no CEMS are actually present on their stacks. Any fuel gas fired through them is monitored through the existing fuel gas H₂S continuous analyzer for that respective fuel gas drum.

Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions – Emission Points: Heaters, Boilers, and Combustion Devices – H037 and H038 (2-104-B-1 and 2-104-B-2) HPVGO Hydrotreater Heaters – Limits to Preclude PSD and Federal Consent Decree. Under Section 2 Emission Limitations paragraph (a), the table for affected units should reflect the Consent Decree limit of 22 tons/year should be in parenthesis under state limit of 23.8 tons/year as was done with other applicable Consent Decree impacted heaters.

Typographical Errors

- There is a font size change error on paragraph “f” on page 55 of 366.
- Cumene is misspelled as “Cumune” under emission unit H014 on page 74 of 366 in the Title section.
- Controlling is misspelled as “controllin” in the next to last paragraph on page 279 of 366.
- 40 CFR 61 Subpart FF is misrepresented as 40 CFR 41 Subpart FF in the last paragraph on page 279 of 366.

Division’s response: Comment acknowledged. Changes were made to the proposed permit. Typographical errors were corrected

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.